

**FILED ELECTRONICALLY VIA ECFS**

February 28, 2019

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: EB Docket 06-36, CPNI Certification for 2018**

Dear Ms. Dortch:

Enclosed for filing is Frontier Communications Corporation's Annual 64.2009(e) CPNI Certification, dated February 28, 2019, as ordered in EB Docket 06-36.

Please contact me should you have questions.

Sincerely,



Judy Geise  
Regulatory Compliance Manager  
Frontier Communications Corporation  
(972) 399-5054  
judy.geise@ftr.com

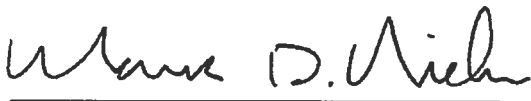
Enclosure

**FRONTIER COMMUNICATIONS CORPORATION**  
**ANNUAL SECTION 64.2009(e) CERTIFICATION**  
**EB Docket No. 06-36**

**Company Name:** Frontier Communications Corporation and Subsidiaries  
**Form 499 Filer IDs:** *See Attachment A*  
**Name of Signatory:** Mark D. Nielsen  
**Title of Signatory:** Executive Vice President, Chief Legal Officer and Secretary  
**Date Filed:** February 28, 2019

I, Mark D. Nielsen, hereby certify that I am a duly authorized officer of Frontier Communications Corporation and its subsidiaries (collectively "Frontier" or the "Company"), which are telecommunications carriers, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission, codified at 47 C.F.R. §§ 64.2001-64.2011, implementing Section 222(c) of the Communications Act of 1934, as amended.

Attached to this certification is a statement explaining how the Company's procedures ensure that Frontier Communications Corporation is in compliance with the requirements set forth in sections 64.2001 et seq. of the Commission's rules. In 2018, the Company made two reports to the FCC's central reporting portal concerning the potential disclosure of CPNI, which are summarized in the accompanying Attachment B. The Company did not take any actions against data brokers in 2018.

  
Mark D. Nielsen

Mark D. Nielsen

Executive Vice President, Chief Legal Officer and Secretary  
Frontier Communications Corporation

**ANNUAL SECTION 64.2009(e)**  
**CPNI CERTIFICATION STATEMENT**  
**COVERING CALENDAR YEAR 2017**  
**EB DOCKET NO. 06-36**

In accordance with 47 C.F.R. § 64.2009(e), the following statement accompanies the Officer Compliance Certificate and explains how the operating procedures of Frontier Communications Corporation and its subsidiaries, which are telecommunications carriers, ensure that the Company is in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. §§ 64.2001-64.2011. The Frontier subsidiaries that are telecommunications carriers do business, generally, under the name "Frontier Communications" and are identified, by name and by Form 499 Filer ID, in Attachment A.

**Operating Procedures**

- Only authorized Frontier Communications employees can access CPNI. Company personnel so authorized, such as customer service representatives, marketing, billing and collection personnel, are trained regarding the appropriate access to, use of, and disclosure of CPNI. Failure to abide by the applicable policies and procedures is cause for discipline, up to and including termination.
- Frontier Communications' managerial personnel monitor access to, use of, and disclosure of CPNI on an on-going basis to ensure compliance with the applicable policies and procedures and to evaluate their effectiveness.
- Frontier Communications has implemented reasonable processes and procedures to discover and protect against attempts to gain unauthorized access to CPNI and provides training on these processes and procedures. Frontier Communications verifies a customer's identity and authenticates the customer as authorized on the account prior to disclosing CPNI based on a customer-initiated telephone or on-line chat contact, on-line account access, or a retail center visit. For certain account requests that provide access to CPNI, heightened authentication measures are required to verify a customer's identity and authenticate the customer as authorized on the account.
- Frontier Communications has implemented supervisory review processes to ascertain whether customer CPNI will be used in marketing efforts and whether customer approval for the use of CPNI is required under the Commission's CPNI rules.

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- Frontier Communications employees involved in marketing are trained as to what information is CPNI and when it may be used to market services to customers.
- All marketing campaigns that utilize CPNI are subject to supervisory approval and, where required, to verification of customer approval before CPNI is utilized. Records related to marketing campaigns that utilize CPNI are maintained for at least one year.
- Frontier Communications requires employees requesting CPNI for the creation of internal data and metrics to obtain supervisor approval and certify that they will follow all CPNI policies and procedures. Certifications are maintained for at least one year.
- Frontier Communications has implemented processes and procedures to prohibit the disclosure of CPNI to joint venture partners and independent contractors for the purpose of marketing communications-related services.
- Frontier Communications has implemented procedures to notify customers of their right to restrict access to, use of, and disclosure of their CPNI.
- Frontier Communications provides local and/or interexchange services to its customers. Frontier Communications uses CPNI without customer approval for: (1) the purposes of providing or marketing services to which that customer already subscribes, including the services and products enumerated in the FCC's rules as within its customers' total services; and (2) those purposes enumerated in Section 222(d) of the Communications Act. Except where use of CPNI is otherwise permitted without prior customer approval, Frontier Communications uses CPNI only to market additional communications-related services upon either obtaining customer opt-out approval, consistent with Section 64.2007 of the Commission's rules, or obtaining "one-time" customer consent for inbound or outbound telephone calls for the duration of the call, consistent with Section 64.2008(f) of the Commission's rules. Frontier Communications does not presently access, use or disclose CPNI in a manner that requires "opt-in" approval.
- Frontier Communications does not allow access to and does not disclose CPNI online unless the customer provides Frontier Communications with a valid user ID and pre-established password.
- Frontier Communications has implemented processes and procedures to prevent the unauthorized release of customer call detail information. Frontier Communications will not release call detail information during a customer-initiated telephone call unless the customer provides Frontier Communications with a pre-established password. Frontier Communications, at the customer's request, will send call detail information to the customer's established address of record or contact the customer at the telephone number of record to disclose the call detail information. If a customer, during a customer-initiated telephone contact, is able to provide, without assistance from Frontier Communications personnel, all of the call detail information necessary to address a customer

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service issue, then Frontier Communications personnel are permitted to proceed with Frontier's routine customer care procedures in relation to that information only. Frontier Communications only releases call detail information to a customer during a retail center visit if the customer provides the pre-established password on the account or provides valid government-issued photo identification.

- Frontier Communications has implemented processes and procedures to notify customers immediately when: (1) a password, PIN, or back-up means of authentication for lost or forgotten passwords is created or changed; (2) the account address of record is changed; (3) an online account is established or changed; or (4) the email address associated with the account changes or a new address is added.
- Frontier Communications has implemented processes and procedures to first inform federal law enforcement agencies, followed up by notification to affected customers, after reasonable determination of a breach of its customers' CPNI in accordance with FCC rules.

ATTACHMENT A - FRONTIER COMMUNICATIONS CORPORATION  
TELECOMMUNICATIONS CARRIER SUBSIDIARIES

| FILER ID # | COMPANY   |
|------------|---|
| 803860     | Frontier California Inc.                        |
| 805302     | Frontier Communications of Minnesota, Inc.      |
| 805782     | Frontier Communications of Michigan, Inc.       |
| 805797     | Frontier Communications of Illinois, Inc.       |
| 805851     | Frontier Communications of Wisconsin LLC        |
| 805299     | Frontier Communications of Iowa, Inc.           |
| 805857     | Frontier Telephone of Rochester, Inc.           |
| 803939     | Frontier Communications of America, Inc.        |
| 821046     | Frontier Communications of Rochester, Inc.      |
| 805374     | Frontier Communications of Mississippi LLC      |
| 805365     | Frontier Communications of Georgia LLC          |
| 805791     | Frontier Communications of Pennsylvania, LLC    |
| 805776     | Frontier Communications of Breezewood, LLC      |
| 805779     | Frontier Communications of Canton, LLC          |
| 805806     | Frontier Communications of Lakewood, LLC        |
| 805845     | Frontier Communications of Sylvan Lake, Inc.    |
| 805830     | Frontier Communications of Oswayo River, LLC    |
| 805773     | Frontier Communications of AuSable Valley, Inc. |
| 805839     | Frontier Communications of Seneca-Gorham, Inc.  |
| 805794     | Frontier Communications of New York, Inc.       |
| 805803     | Frontier Communications of Lakeside, Inc.       |
| 805785     | Frontier Communications of Indiana LLC          |
| 805788     | Frontier Communications of DePue, Inc.          |
| 805809     | Frontier Communications - Midland, Inc.         |
| 805836     | Frontier Communications – Schuyler, Inc.        |

**ATTACHMENT A - FRONTIER COMMUNICATIONS CORPORATION**  
**TELECOMMUNICATIONS CARRIER SUBSIDIARIES**

|        |  |
|--------|--|
| 805833 | Frontier Communications – Prairie, Inc.                          |
| 803900 | Frontier Communications Northwest Inc.                           |
| 805827 | Frontier Communications of Orion, Inc.                           |
| 805821 | Frontier Communications of Mt Pulaski, Inc.                      |
| 805848 | Frontier Communications of Thorntown, LLC                        |
| 828347 | Frontier Communications of the Carolinas, LLC                    |
| 805362 | Frontier Communications of the South, LLC                        |
| 828346 | Frontier Communications of the Southwest Inc.                    |
| 828345 | Frontier Communications Online and Long Distance Inc.            |
| 803862 | Frontier Florida LLC   |
| 805070 | Frontier Midstates Inc.  |
| 803870 | Frontier North Inc.  |
| 803950 | Frontier Southwest Incorporated                                  |
| 806310 | Frontier West Virginia Inc.                                      |
| 803993 | Citizens Telecommunications Company of New York, Inc.            |
| 803996 | Citizens Telecommunications Company of the White Mountains, Inc. |
| 803995 | Citizens Telecommunications Company of Montana                   |
| 803931 | Citizens Telecommunications Company of Tennessee L.L.C.          |
| 820800 | Citizens Telecommunications Company Minnesota, LLC               |
| 805113 | Citizens Telecommunications Company of Nevada                    |
| 802899 | Citizens Utilities Rural Company, Inc.                           |
| 820716 | Citizens Telecommunications Company of Illinois                  |
| 802893 | Citizens Telecommunications Company California Inc.              |
| 802920 | Ogden Telephone Company  |
| 803988 | Citizens Telecommunications Company of Utah                      |
| 805038 | Citizens Telecommunications Company of West Virginia             |

**ATTACHMENT A - FRONTIER COMMUNICATIONS CORPORATION  
TELECOMMUNICATIONS CARRIER SUBSIDIARIES**

|        |   |
|--------|---|
| 803994 | Citizens Telecommunications Company of Idaho    |
| 805137 | Citizens Telecommunications Company of Oregon   |
| 805131 | Navajo Communications Company, Inc.             |
| 820718 | Citizens Telecommunications Company of Nebraska |
| 822888 | CTE Telecom, LLC                                |
| 805650 | Commonwealth Telephone Company LLC              |
| 815558 | CTSI, LLC                                       |
| 804489 | The Southern New England Telephone              |
| 803664 | SNET America, Inc.                              |



**ATTACHMENT B**

During 2018, Frontier submitted two reports through the FCC's central reporting facility (reference numbers 2018-5262 and 2018-10200) describing instances where Frontier learned that certain customer phone lines were forwarded without customer consent. Frontier's Security department determined that identity thieves had obtained customer confidential information from non-Frontier sources and used this information to engage in pretexting to access customer accounts, either online or through a customer service representative, and forward calls from the customer's number in order to perpetuate a fraudulent scheme. Frontier took appropriate steps to alert customers impacted and remedy the improper forwarding. Frontier also implemented additional security measures to block future unauthorized access to these customers' accounts.